

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Gettys Bryant Millwood and John Baker )  
McClanahan, Personal Representative of the )  
Estate of Melissa Buchanan, on behalf of )  
Themselves and all others similarly situated, )

C/A No. 7:19-cv-01445-DCC

Plaintiffs, )

v. )

State Farm Life Insurance Company, )

Defendant. )

**CONSENT MOTION TO ALTER  
TIME FOR DEFENDANT TO  
RESPOND TO PLAINTIFF'S  
SUPPLEMENTAL BRIEF ON  
PRIVILEGE ISSUES (ECF # 105)**

Comes now Defendant State Farm Life Insurance Company who moves this Court pursuant to Rule 6(b), FRCP and Rule 6.01 of the Local Rules of Civil Procedure, for an order granting an extension of time, until and including June 25, 2021, for Defendant to submit a response to Plaintiffs' Supplemental Memorandum of Law Concerning Privilege Issues (ECF # 105). As support for this Motion and in compliance with Rule 6.01, Defendant through its undersigned counsel would show the following:

1. Based upon the June 10, 2021 telephone status conference held by Judge Coggins, Defendant's current deadline to submit a response to Plaintiffs' Supplemental Memorandum of Law Concerning Privilege Issues is June 17, 2021.
2. The extension, if granted, would extend Defendant's time to submit its response on this issue by eight (8) days.
3. The extension requested would not impact any other case deadlines.
4. The reason and good cause for this requested extension is that the parties have been working diligently to resolve the issues raised in Plaintiffs' Supplemental Memorandum of Law Concerning Privilege Issues via phone calls, a meet and confer, and email exchanges. Through the work of the parties, the documents at issue in Plaintiffs' Supplemental Memorandum have been reduced from approximately 120 documents to 5 documents. The parties believe that with the additional time requested, the parties may be able to resolve their disputes on some or all the remaining 5 documents. This will, of course, be to the parties' benefit and also will decrease the burden the parties would place upon the Court.
5. For clarity, the parties note that notwithstanding the requested extension for State Farm to file its response, the parties will still be submitting their June status conference report which Judge Coggins requested the parties to file by June 18, 2021 during the June 10, 2021 telephone status conference.

6. The undersigned counsel consulted with Plaintiffs' counsel concerning the above request for an extension. Plaintiffs' counsel has consented to the requested extension as evidenced by Mr. Wilkerson's signature below.

Accordingly, for these reasons and good cause, Defendant with Plaintiffs' consent moves for an Order extending the date to submit Defendant's response to Plaintiff's Supplemental Memorandum of Law Concerning Privilege Log Issues from June 17, 2021 to June 25, 2021.

WE SO MOVE AND CONSENT:

s/Joshua Tate Thompson

Perry D Boulrier  
Joshua T. Thompson  
Boulrier Thompson & Barnes, LLC  
PO Box 1897  
Spartanburg, SC 29304  
864-585-4273  
864-585-3844 (fax)  
pboulrier@holcombebomar.com

STINSON LLP

Todd Noteboom (admitted pro hac vice)  
MN Bar #0240047  
50 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
Telephone: 612.335.1500  
Facsimile: 612.335.1657  
E-mail: todd.noteboom@stinson.com

Jeremy Root (admitted pro hac vice)  
MO Bar #59451  
230 W. McCarty Street  
Jefferson City, MO 65101-1553  
Telephone: 573.636.6263  
Facsimile: 573.636.6231  
E-mail: jeremy.root@stinson.com

ALSTON & BIRD LLP

Cari. K. Dawson (admitted pro hac vice)  
GA Bar #213490  
Tiffany L. Powers (admitted pro hac vice)  
GA Bar #586589  
One Atlantic Center  
1201 West Peachtree Street, Suite 4900  
Atlanta, GA 30309-3424  
Telephone: 404.881.7000  
Facsimile: 404.881.7777  
Email: Cari.Dawson@alston.com  
Email: Tiffany.Powers@alston.com

ATTORNEYS FOR DEFENDANT

WE SO CONSENT:

s/David M. Wilkerson  
DAVID M. WILKERSON  
SC Federal ID# 7188  
The Van Winkle Law Firm  
11 N. Market Street Asheville, NC 28801  
Phone: 828-258-2991  
Fax: 828-257-2767  
[dwilkerson@vwlawfirm.com](mailto:dwilkerson@vwlawfirm.com)

James J. Pizzirusso  
Nathaniel C. Giddings  
Melinda R. Coolidge  
HAUSFELD LLP  
1700 K Street, NW  
Washington, DC 20006  
Tele: 202-540-7200  
Email: [jpizzirusso@hausfeld.com](mailto:jpizzirusso@hausfeld.com)  
Email: [ngiddings@hausfeld.com](mailto:ngiddings@hausfeld.com)

Jeffrey Kaliel  
Sophia Goren Gold  
Kaliel PLLC  
1875 Connecticut Avenue NW, 10th Floor  
Washington, DC 20009  
202-350-4783  
[jkaliel@kalielllc.com](mailto:jkaliel@kalielllc.com)  
[sgold@kalielllc.com](mailto:sgold@kalielllc.com)

Larry D. Lahman  
Roger L. Ediger  
MITCHELL DeCLERCK  
202 West Broadway Avenue  
Enid, Oklahoma 73701  
Tel.: 580-234-5144  
Email: [larry.lahman@sbcglobal.net](mailto:larry.lahman@sbcglobal.net)  
Email: [rle@mdpllc.com](mailto:rle@mdpllc.com)

George Brandt, III (Fed. Bar No. 01451)  
HENDERSON, BRANDT & VIETH, P.A.  
360 E. Henry St., Suite 101  
Spartanburg, SC 29302  
Phone: 864-583-5144  
[gbrandt@hbvlaw.com](mailto:gbrandt@hbvlaw.com)

Attorneys for Plaintiff